

THE HONORABLE BRIAN D. LYNCH
CHAPTER 13
HEARING DATE: June 4, 2019
HEARING TIME: 1:00 P.M.
LOCATION: Vancouver, Washington
RESPONSE DATE: May 28, 2019

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

In Re:
CELENA ANN WILLIAMS,
Debtor.

Case No. 19-40662-BDL

TRUSTEE'S OBJECTION TO EXEMPTIONS AND NOTICE OF HEARING

NOTICE

YOU ARE HEREBY NOTIFIED that a hearing on Trustee's Objection to Exemptions will be heard before the Honorable Brian D. Lynch at **1:00 p.m. on June 4, 2019**, at the Federal Building, 500 West 12th Street, 2nd Floor, Vancouver, WA 98660.

IF YOU OPPOSE this motion, you must file your written response with the Court Clerk and deliver copies on the undersigned and all interested parties, NOT LATER THAN THE RESPONSE DATE, which is **May 28, 2019**. You should also appear at the time of hearing. If you fail to do so, the Court may enter an order granting the motion without any hearing and without further notice.

TRUSTEE'S OBJECTION TO EXEMPTIONS AND NOTICE OF HEARING

Michael G. Malaier
Chapter 13 Standing Trustee
2122 Commerce Street
Tacoma, WA 98402
(253) 572-6600

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OBJECTION

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3 **COMES NOW**, Michael G. Malaier, the Chapter 13 Trustee, and hereby objects to
4 Debtor's claimed exemptions as amended pursuant to 11 U.S.C. §522(l) and Fed. R. Bankr. P.
5 4003(b). The Trustee makes this objection without limitation to those exemptions set forth on
6 Schedule C of the bankruptcy schedules filed in this case. Trustee objects to specific exemptions
7 as follows:

Description of Property	Statute(s) Cited	Exemption Claimed	Petition Value	Trustee's Estimated Value
Potential personal injury claim for motor vehicle accident on 5/11/18	Wash. Rev. Code § 6.15.010(1)(d)(vi)	\$20,000.00	\$5,000.00	Unknown

13 The applicability of Debtor's exemptions cannot be determined until the claim is
14 liquidated. Trustee, therefore, objects to the exemptions claimed by Debtor to preserve any and
15 all rights that Trustee may have to raise such objections on receipt of additional information
16 regarding the nature of the assets and the basis for the claim of exemption. Trustee also reserves
17 the right to assert any other basis for an objection regarding any exemption or to otherwise
18 amend his objections to any exemption as may be appropriate at a the time the claim is
19 liquidated. Therefore, the claimed exemption should be held in abeyance until such time as the
20 claim is liquidated.

WHEREFORE the Trustee files this objection to preserve these issues, pending the Trustee's investigation and evaluation, and in the event the Debtor becomes entitled in the future to a settlement or other payment on the claim.

DATED this 3rd day of May, 2019.

/s/ Mathew S. LaCroix

CERTIFICATE OF MAILING

I certify under penalty of perjury under the laws of the United States that on May 3, 2019, I caused to be mailed via regular mail a true and correct copy of Trustee's Objection to Exemptions and proposed Order to the following:

Celena Ann Williams
7129 NE 28th Ave
Vancouver WA 98665

The following parties received Trustee's Objection to Exemptions and proposed Order via ECF:

Ellen Ann Brown
Lance E. Olsen
U.S. Trustee

Executed at Tacoma, Washington this 3rd day of May, 2019.

/s/ Ruth Wilson
Motion Coordinator for
Chapter 13 Trustee

Michael G. Malaier
Chapter 13 Standing Trustee
2122 Commerce Street
Tacoma, WA 98402
(253) 572-6600